

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

J.G.,)	
)	
Plaintiff,)	
)	Civil Action File
v.)	No. 1:20-cv-05233-SEG
)	
NORTHBROOK INDUSTRIES, INC.,)	
d/b/a UNITED INN AND SUITES,)	
)	
Defendant.)	

**JOINT MOTION FOR EXTENSION OF PAGE LIMIT
WITH RESPECT TO CONSOLIDATED MOTIONS *IN LIMINE* AND
MEMORANDUM IN SUPPORT**

COME NOW Plaintiff J.G. (“Plaintiff”) and Defendant Northbrook Industries, Inc., d/b/a United Inn & Suites (“Defendant”), by and through their respective counsel of record, and, pursuant to Section III-D of the Court’s Standing Order Regarding Civil Litigation, hereby jointly move the Court for an order allowing an extension of the 25-page limit on briefs supporting the parties’ respective consolidated motions *in limine*.

Both Plaintiff and Defendant intend to file motions *in limine* by the February 26, 2025 deadline. To avoid unnecessary repetition of background information, each party is preparing a single consolidated submission comprised of several motions *in limine* and supporting briefing. While technically not a single motion

and brief, out of an abundance of caution each party seeks an extension of the 25-page limit for its consolidated motions and briefs. The parties jointly request that that the page limit for the consolidated motions *in limine* with supporting briefing be extended to 30 pages for each party. A proposed order is attached.

L.R. 7.1(D) CERTIFICATION

The undersigned counsel hereby certify that this filing has been prepared in Times New Roman (14 point), which are font and point selections approved by the Court in L.R. 5.1(C).

Respectfully submitted,

/s/ David H. Bouchard
David H. Bouchard
Georgia Bar No. 346750
FINCH McCranie, LLP
225 Peachtree Street N.E.
1700 South Tower
Atlanta, Georgia 30303
Telephone: (404) 658-9070
Facsimile: (404) 688-0649
david@finchmccranie.com

Attorney for Plaintiff J.G.

/s/ Dana M. Richens
Dana M. Richens
Georgia Bar No. 604429
SMITH, GAMBRELL & RUSSELL, LLP
1105 W. Peachtree NE, Suite 1000
Atlanta, Georgia 30309
Telephone: (404) 815-3659
Facsimile: (404) 685-6959
drichens@sgrlaw.com

Attorney for Defendant
Northbrook Industries, Inc.
d/b/a United Inn and Suites

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served all parties with the within and foregoing **JOINT MOTION FOR EXTENSION OF PAGE LIMIT WITH RESPECT TO CONSOLIDATED MOTIONS *IN LIMINE* AND MEMORANDUM IN SUPPORT** via the Court's CM/ECF electronic filing system, which will automatically provide notice of filing constituting service to all counsel of record.

This 20th day of February, 2025.

/s/ Dana M. Richens